

# **EXHIBIT 1**



**U.S. Department of Justice**

United States Attorney  
District of Minnesota

600 United States Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415

Telephone: (612) 664-5600  
Fax: (612) 664-5787

April 7, 2017

Rachel Paulose  
DLA Piper LLP  
80 South Eighth Street, Suite 2800  
Minneapolis, MN 55402-2103

Re: *United States v. Edward S. Adams*  
Cr. 17-64 (DWF/KMM)

Dear Ms. Paulose:

Pursuant to our discovery obligations, we will be making documents available to you early next week via USAfx (which will also include the load files). Those materials are in the final stages of being prepared for production. For your convenience, the attached log details the material that will be made available next week.

The following documents are not available in electronic format but are available for review in our office:

- Berwyn Fund Prospectus/Annual Reports
- Santander Bank Scio records

Additionally, the SEC produced a database of documents to us related to its investigation. We believe that Mr. Adams may already have these documents or have been provided access to them by the SEC, but we can provide you with a copy of this database upon request. We also have transcripts of the testimony of several witnesses who appeared before the SEC (including Mr. Adams), as well as numbered exhibits from the testimony. If Mr. Adams has not yet received these materials, we will provide them to you upon request.

Finally, as you are likely aware, we obtained emails from Mr. Adams' two Yahoo email accounts via search and seizure warrant. We will provide you with the data from the two accounts in the unfiltered format in which it was produced by Yahoo, as well as the database with which we have been working, which has been filtered in an effort to remove potentially privileged, as well as non-responsive, emails and documents. We are

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now processing that database for production, and, upon completion of the processing, we will provide it to you. If you would like a copy of the three databases discussed above (the SEC database, the unfiltered Yahoo materials, and the filtered email database), you will need to provide a 200GB hard drive onto which we can copy these materials. We will contact you when the processing has been completed and the materials have been copied onto the hard drive.

Please feel free to call either one of us with any questions.

Sincerely,

GREGORY G. BROOKER  
Acting United States Attorney

A handwritten signature in black ink, appearing to read 'David M. Maria', written over the typed name of David M. Maria.

BY: DAVID M. MARIA  
JOHN E. KOKKINEN  
Assistant U.S. Attorneys

Adams Records

4/7/2017

Source	Beg Doc	End Doc
Abujawdeh, Dina	00013246	00013247
Adams, Denise L. (Atty: Jon Hopeman)	00000001	00000018
Adams, Edward S. (Atty: Jon Hopeman)	00000019	00002400
Adams, Edward S. (Atty: Jon Hopeman)	00013248	00013581
Adams, Edward S. (Atty: Jon Hopeman)	00013582	00013840
Altenbach, Susan	00014010	00014343
American Express/Datamark,	00042751	00042753
American Express/Datamark,	00045668	00045862
American Express/Datamark,	00045885	00045986
American Express/Datamark,	00046096	00046227
American Express/Datamark,	00046304	00046362
American Express/Datamark,	00046942	00047073
AMG Funds	00014344	00014383
Ariel Investment Trust	00014384	00014437
Bank of America	00014438	00014454
Bank of America	0001445	00015765
Bank of America	00015766	00015774
Bank of America NA	00002589	00002609
Barnstable County Registry Of Deeds (MA)	00002610	00002643
Berman, Lyle	00015775	00016255
Berwyn Funds	00016256	00016263
Berwyn Funds		
Bruce Fund c/o Huntington Asset Services, Inc.	00016270	00016294
Burnett County Register Of Deeds (WI)	00002644	00002706

Adams Records

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Source	Beg Doc	End Doc
Charles Schwab & Co. Inc.	00016295	00019371
Charles Schwab Bank	00019372	00019372
Clifton Larson Allen	00019373	00027680
Commonwealth of Massachusetts Attn: Massachusetts Environmental Police Boat, Recreation Vehicle & Snowmobile Registration Bureau (MA)	00002707	00002720
Delta Airlines, Inc.	00002721	00002739
Devenir Wealth Management	00027681	00028060
Elan Financial	00041575	00041973
Elan Financial	00042125	00042288
EMAIL	00000001	00489258
Empire Stock Transfer Inc.	00042941	00045584
Empire Stock Transfer Inc.	00051715	00051741
Empire Stock Transfer Inc.	00002740	00002936
Engelkemier	00028061	00028609
Engkjer-Spitzley M. Faye	00028145	00028609
Exterior Design Studio LTD	00042754	00042766
Fidelity Investments/Fidelity Brokerage Services	00002937	00004400
Fidelity Investments/Fidelity Workplace Services	00042767	00042781
Fidelity Investments/Fidelity Workplace Services	00045585	00045609
Fifth Third Bank	00028610	00028617
First Eagle Funds	00005847	00005896
First National Bank	00028618	00028987
First National Bank	00028988	00029276
First National Bank	00005897	00005931
Gabelli Funds	00029277	00029299

Adams Records

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Source	Beg Doc	End Doc
Hennepin County Recorder & Registrar of Titles	00005932	00006099
Hennepin County Recorder & Registrar of Titles	00029300	00029383
Hey, Steven	00042289	00042592
Intralinks, Inc.	00029422	00029422
Johnson, Harry	00029423	00030218
Krochmal, Michael	00030219	00030228
Krochmal, Michael	00042593	00042612
Legg Mason Global Asset Management	00030231	00030276
Lister, Carol	00030279	00030597
Mack, Kris	00030598	00030598
Mass Mutual Financial Group	00030599	00030599
MB Financial Bank, N.A.	00047074	00047395
MBSC Securities Corporation c/o The Bank of New York Mellon	00030600	00030729
McKoskey, William	00030730	00031343
Minnesota Dept. of Public Safety Driver & Vehicle Services	00031344	00031370
Monahan, Michael R. (atty: Paul Dworak)	00002401	00002588
Mumm, Chris	00031371	00031837
Murry & Associates	00031838	00034791
Murry & Associates	00034732	00034791
Newport Coast Securities	00034792	00035078
Nymeo Federal Credit Union	00035079	00035083
Parsons Commercial Group, Inc.	00006184	00006430
PeoplesBank	00006447	00006451
PEOPLESBANK	00006431	00006446
Plekkenpol Builders Inc.	00042782	00042928
Quantronix, Inc.	00035533	00035547
Rapello, Paul	00035548	00035622
Riedel, John	00045649	00045667
Rothman, Steve	00035623	00035716
Rydex Fund Services, LLC/Guggenheim Investments		

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Source	Beg Doc	End Doc
Rydex Funds Services	00035717	00035851
Sankovsky, Robert	00035852	00036099
Santander Bank, NA		
Santander Bank, NA		
Santander Bank, NA		
Schroeder, Brett	00036100	00036413
Scio Diamond Technology Corp.	00009639	00011540
Scio Diamond Technology Corp.		
SEC	SEC-USAO-000000001	SEC-USAO-000021388
SEC	SEC-ADAMS-000001	SEC-ADAMS-032745
SEC	EST_00000001	EST_00017016
SEC	SEC-MONAHAN-000001	SEC-MONAHAN-002678
Security Mutual Life Insurance Company of New York	00036422	00036751
South State Bank	00006452	00006917
South State Bank (South Carolina Bank & Trust)	00036752	00037974
TIAA CREF Financial Services	00038756	
TIAA CREF Financial Services		00038941
Topographix	00038942	0039163
TransUnion	00042929	00042940
Turturici, Jamie	00042613	00042750
US Bank National Association	00039164	00039251
Vanguard Group, LLC	00039252	00039357
Vartughian, Ed	00039358	00039411
Venture Bank	00039412	00039805
Venture Bank	00039806	00040450



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Source	Beg Doc	End Doc
Venture Bank	00040451	00040533
Venture Bank	00040534	00040829
Venture Bank	00006918	00008097
Venture Bank	00047396	00050250
Wells Fargo Bank, N.A.	00050251	00051714
Wells Fargo Financial Advisors, LLC	00008098	00009638
Wells Fargo Home Mortgage	00045610	00045648
Westwood Funds	00040830	00040856
Winchester, Slade	0040857	00040939
Wisconsin Dept. of Natural Resources	00040940	00040949
Zipkin, Jill S.	00011541	00013245
Zipkin, Larry	0040950	00041574